



ENVIRONMENTAL CONSULTANTS

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Mr. Ross del Rosario  
USEPA Region 5 – SR6J  
77 W. Jackson Boulevard  
Chicago, Illinois 60604-3590

February 10, 2012  
2037

RE: January 2012 Monthly Progress Report  
Former Crawford Station MGP Site  
Chicago, Illinois  
Peoples Gas Light and Coke Company

**CERCLA Docket No. V-W-08-C-917 and V-W-11-C-981**  
**CERCLIS ID – ILN0000510192**

Dear Mr. del Rosario:

On behalf of Integrys Business Support, LLC (IBS), Natural Resource Technology, Inc. (NRT) is providing this Monthly Progress Report for the Former Crawford Station Manufactured Gas Plant (MGP) Site. This report encompasses the Removal Action work and the Remedial Investigation/Feasibility Study (RI/FS) activities that are being performed concurrently.

## **I. Time Critical Removal Action (AOC V-W-11-C-981)**

### **1) Progress Made During the Past Month**

- The Removal Action on Parcels A, B & O is underway in accordance with the USEPA-approved Removal Action Work Plan, Rev. 1 (RAWP).
- Permit applications have been filed for construction with the City of Chicago Office of Underground Construction (OUC); delays have been experienced in receipt of permit approvals from the City of Chicago. Verbal approval has been given authorizing shallow (less than 10 feet bgs) excavations.
- Permit applications for wastewater discharge authorization from the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC) have been reviewed and permit approval is pending. A permit application for wastewater discharge to the City's interceptor sewer has been filed with the City of Chicago Department of Buildings. Permit conditionally approved pending influent analytical data.
- Site preparation work has begun, including installation of truck scale, construction of access roads, Amendment and Overburden Pads, and Vehicle Decontamination Area.
- Contractors have mobilized to the site for excavation activities and construction of sheetpile wall.
- Construct padding to protect high-pressure gas lines from vehicle traffic. Padding consists of crane mats covered with gravel.
- Coordination with the disposal company, Waste Management, has been ongoing to establish waste profiles. Draft waste profiles have received and are being reviewed.
- Completed and submitted December monthly progress report to USEPA on January 11, 2011.

- A second Baseline Air Monitoring Event was conducted on January 4, 2012. Laboratory analysis for the air samples collected during the two Baseline Air Monitoring Events has been received.

## 2) Analytical and Other Testing Results Received

- Baseline Air Monitoring Event sampling data is provided in Attachment No. 1.

## 3) Project Work Next Month

### IBS Actions

- Begin soil excavation activities and commence hauling to Waste Management's Laraway Road RDF.
- Begin Full Scale Startup Perimeter Air Monitoring consisting two 12-hour SUMMA and PM<sub>10</sub> monitoring and sampling events per week for the first four weeks.
- Conduct Periodic Real-Time Air Monitoring with portable and hand-held equipment during construction activities.
- Conduct Post-Excavation Soil sampling for every 50 feet of wall and 2,500 square feet of floor.
- Complete Supplemental Quality Assurance Project Plan consistent with UFP-QAPP Manual for TestAmerica Laboratories.

### USEPA Actions

- First site visit and meeting with USEPA to be on 2/2/2012.

## 4) Anticipated Schedule

| Deliverable or Milestone   | Target Date                            | Actual Date       |
|--|--|-------------------|
| Settlement Agreement Signed  | --                                     | October 12, 2011  |
| Project Start Date   |  | October 12, 2011  |
| Monthly Progress Reports   | Due the 11 <sup>th</sup> of Each Month |                   |
| Removal Action Work Plan, Rev 0 <sup>1</sup>   |  | August 1, 2011    |
| Removal Action Work Plan, Rev. 1 <sup>1</sup>  |  | September 6, 2011 |
| USEPA Approval of RAWP <sup>1</sup>  |  | September 8, 2011 |
| Removal Action – Start Date  | November 2011                          | January 31, 2012  |
| Removal Action – Completion Date   | Late Summer 2012                       |                   |
| <sup>1</sup> Removal Action Work Plan documents were prepared pursuant to AOC V-W-08-C-917 |  |                   |

## 5) Problems or Potential Problems Encountered

- Initiation of construction work was delayed due to the need to secure OUC and MWRD permits for the work.

## **6) Actual or Planned Resolution of Problems or Potential Problems**

- Schedule adjustments may be necessary to account for longer than expected permitting process.

## **II. RI/FS Activities (AOC V-W-08-C-917)**

### **1) Progress Made During the Past Month**

- A pre-scoping/planning meeting related to the Site Specific Work Plan (SSWP) was held with USEPA and IBS on January 24, 2012. NRT presented a phasing plan for conducting a series of four SSWPs to encompass the entire 260-acre Crawford Station MGP site. The plan was discussed and USEPA concurred with the overall phasing concept and that the first SSWP (Phase I) would include Parcels Q&U, O, P and K.
- Addendum No. 1 to the Completion Report (Revision 0 dated 12/23/2011) was prepared and submitted to USEPA on January 31, 2012. Addendum No. 1 provides site investigation data related to Parcel K that was not previously incorporated into the Completion Report.

### **2) Analytical and Other Testing Results Received**

- None.

### **3) Project Work Next Month**

#### **IBS Actions**

- The Phase I SSWP for Parcels Q&U, O, P and K is in progress and is proceeding based upon the phasing plan discussed with USEPA during the above referenced scoping meeting. The Phase I SSWP is due to be submitted to USEPA on March 14, 2012.

#### **USEPA Actions**

- Review of the Completion Report and Addendum No. 1 is pending.

### **4) Anticipated Schedule**

| Deliverable or Milestone               | Target Date                            | Actual Date       |
|--|--|-------------------|
| Settlement Agreement Signed            | --                                     | October 31, 2008  |
| Project Start Date                     |  | December 15, 2011 |
| Monthly Progress Reports               | Due the 14 <sup>th</sup> of Each Month |                   |
| Completion Report , Rev. 0             | December 15, 2011                      | December 23, 2012 |
| Pre-Site Specific Scoping Meeting      | January 24, 2012                       | January 24, 2012  |
| Site Specific Work Plan, Rev. 0        | March 14, 2012                         |                   |
| Receive USEPA Comments on SSWP, Rev. 0 | May 14, 2012                           |                   |
| Site Specific Work Plan, Rev. 1        | June 28, 2012                          |                   |
| USEPA Approves SSWP, Rev. 1            | July 29, 2012                          |                   |
| RI/FS (Parcel Group 1)                 | July 2012 to Sept. 2014                |                   |

#### 5) Problems or Potential Problems Encountered

- None. See schedule comment above.

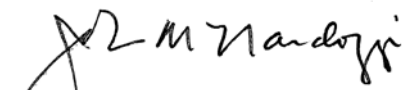
#### 6) Actual or Planned Resolution of Problems or Potential Problems

- None.


Please contact Mr. Naren Prasad of IBS at 312.240.4569 if you should have any questions regarding the content of this progress report.

Sincerely,

NATURAL RESOURCE TECHNOLOGY, INC.



John M. Nardozzi, P.E.  
Principal Engineer



Timothy B. Norris, PG  
Geologist

Attachments:

Attachment No. 1 – Baseline Air Monitoring Data

cc: D. Wilson, IEPA (via US Mail and email)  
Mr. Naren Prasad, Integrys (via email)  
Mr. David Klatt, CH2M Hill (via email)  
Ms. Jennifer Kahler, NRT

**Attachment No. 1**  
**2011-12 Baseline Air Monitoring**  
**Former Crawford Station MGP Site, Chicago, Illinois**  
**Peoples Gas Light and Coke Company**  
ILN0000510192

| Air Station | Client ID | Sample Collection Date | Benzene           | Ethylbenzene      | m&p-Xylene        | o-Xylene          | Toluene           | Naphthalene       |
|-------------|-----------|------------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|
|             |           |                        | ug/m <sup>3</sup> | ug/m <sup>3</sup> | ug/m <sup>3</sup> | ug/m <sup>3</sup> | ug/m <sup>3</sup> | ug/m <sup>3</sup> |
| North       | 111228001 | 12/28/11               | 1.1               | 1.1 U             | 2.2 U             | 1.1 U             | 2.3               | 3.4 U             |
| East        | 111228002 | 12/28/11               | 1.2               | 1.2 U             | 2.4 U             | 1.2 U             | 1.5               | 8.6               |
| West        | 111228003 | 12/28/11               | 1.2               | 1.1 U             | 2.2 U             | 1.1 U             | 2.1               | 3.7               |
| West        | 120104001 | 1/4/12                 | 4                 | 1.1 U             | 2.2 U             | 1.1 U             | 2.7               | 3.4 U             |
| East        | 120104002 | 1/4/12                 | 2.6               | 1.2 U             | 2.4 U             | 1.2 U             | 2.3               | 19.7              |
| North       | 120104003 | 1/4/12                 | 2.9               | 1.2 U             | 2.4 U             | 1.2 U             | 2.5               | 3.6 U             |

U = "under" or less than reported value.